

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTELLECTUAL VENTURES I LLC and
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

v.

MOTOROLA MOBILITY LLC

Defendant.

Civil Action No. 11-cv-908-SLR-MPT

**STIPULATION AND ORDER GRANTING EXTENSION OF TIME
FOR CERTAIN CASE DEADLINES AND OTHER RELATED MATTERS**

IT IS HEREBY STIPULATED AND AGREED TO, by and between Plaintiffs, Intellectual Ventures I LLC and Intellectual Ventures II LLC (collectively, "Plaintiffs"), and Defendant, Motorola Mobility LLC ("Defendant"), subject to the approval of the Court, that the Scheduling Order entered on January 13, 2012 is amended as follows:

- a) The close of fact discovery is extended until March 29, 2013;
- b) The deadline for expert reports for parties with the burden of proof is extended until April 17, 2013;
- c) The deadline for rebuttal expert reports is extended until May 15, 2013;
- d) The deadline for supplemental reports on secondary considerations is extended to June 3, 2013;
- e) The close of expert discovery is extended to June 21, 2013;
- f) All *Daubert* motions are due by July 19, 2013;
- g) The Joint Claim Construction Statement is due on June 28, 2013;
- h) Plaintiffs' Claim Construction Brief is due on July 26, 2013;

i) Defendant's Claim Construction Brief is due on August 9, 2013;
j) Plaintiffs' Reply Claim Construction Brief is due on August 23, 2013;
k) Defendant's Sur-Reply Claim Construction Brief is due on September 6, 2013,
and

l) All other dates, including the dates for Summary Judgment briefing, briefs on non-infringement and validity, the claim construction/summary judgment hearing, pre-trial conference, and trial remain as set out in the January 13, 2012, Scheduling Order at Docket No. 16 and are not adjusted by these modifications.

The parties further agree: i) Defendant will not seek to stay the instant litigation, either in its entirety or as to any one patent asserted in the litigation, pending reexamination unless the United States Patent Office issues a Right of Appeal Notice for a patent under reexamination; and ii) Defendant will not seek to consolidate this litigation with any later-filed case that involves the patents (or related patents) currently asserted against Defendant in this case and that does not involve Google, Defendant, an affiliate of either company, or any company to whom Google, Defendant, or an affiliate owes or may owe any legal or other obligation based on the later-filed patent infringement claims.

Dated: November 14, 2012

Respectfully submitted,

FARNAN LLP

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

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*Attorneys for Plaintiffs Intellectual Ventures I
LLC and Intellectual Ventures II LLC*

Attorneys for Motorola Mobility LLC

SO ORDERED on this _____ day of November, 2012.

The Honorable Sue L. Robinson